Distribution Integrity Management Frequently Asked Questions

Revised or Added 8/24/11

Subpart P – Gas Distribution Pipeline Integrity Management

C.2.1 Must peak shaving and LNG facilities connected to our distribution pipeline system be considered in our DIMP?

A DIMP plan must include all parts of a gas distribution pipeline subject to Part 192. Liquefied petroleum gas (LPG) facilities are regulated under Part 192. Where an LPG peak shaving facility is part of an operator's distribution pipeline, it must be included in its DIMP plan.

LNG facilities are regulated under Part 193 and therefore are not required to be included in a DIMP plan. However, PHMSA encourages operators to manage the risk from all of their facilities, and operators may elect to include LNG plants connected to their distribution pipelines in their DIMP plans as a means of doing so.

C.3.10 What are the requirements for distribution systems put in service after 8/2/2011?

At the time a new distribution system is put into service, an operator must have developed and implemented an integrity management program that includes a written integrity management plan as specified by 49 CFR 192.1007 or 192.1015(b).

C.3.11 What are the requirements for distribution systems acquired after 8/2/2011?

Operators must have a DIMP plan in place before taking over the operation of an acquired pipeline system. For purposes of distribution integrity management, an operator acquiring an existing pipeline system would be expected to either use the existing plan after verifying its adequacy, or integrate the newly acquired system into their integrity management program.

The new operator inherits the risk mitigation measures implemented and planned for implementation from the original operator's plan unless they justify alternative measures to reduce risk.

C.4.b.6 Since we have not experienced any issues with pre 1973 Aldyl "A" pipe in the past, we did not subdivide plastic pipe in our risk evaluation. It is a potential threat to us only because of other operators' experience. Should we have treated it as an applicable threat?

Yes. Susceptibility to premature brittle-like cracking of certain Aldyl "A" pipe, along with other vintages and manufacturer's products, is a well-documented problem in the industry and the subject of the PHMSA Advisory Bulletin ADB-07-02 (72 FR 51301), Updated Notification of Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe. This is a "threat" applicable to any Aldyl "A" pipe in service (under the general category of "material"), whether or not the threat has resulted in leakage to date. The operator needs to consider this as an applicable threat.

C.4.b.7 Must I consider historical leak data after a section of pipeline has been replaced?

Operators must consider all reasonably available information to identify threats. Leaks are often caused by factors external to the pipe, including corrosive environments, stray currents, etc. Replacing pipe eliminates leaks but does not necessarily eliminate the causes of those leaks. Historical data can be important in evaluating the relative likelihood of leaks occurring on the replaced pipe, particularly if the replacement pipe is of similar material and vintage. Operators who do not consider historical leak data as part of their DIMP plan must be prepared to demonstrate to inspectors that the data is no longer relevant.

C.4.b.8 We often replace a section of pipeline rather than repairing individually the leaks in that section. In this case, must we record the number and grade of leaks?

The number and severity of leaks can be important information in evaluating the risk posed by a pipeline in a given location. Operators should consider leak history in their threat evaluations and thus field records should include the number and grade of leaks in sections of pipe that are replaced. Operators who do not record this information must be prepared to explain why this missing data does not impact their risk analysis.

C.4.c.5 Do multiple threats need to be considered for each facility grouping? Do all threats need to be in one relative risk ranking?

The DIMP rule does not prescribe a risk evaluation methodology. The operator may choose a methodology which considers multiple threats to each group of facilities but the rule does not require this. The rule does prescribe that the risk ranking must consider each applicable current and potential threat. An operator may choose to group facilities differently for each threat, in which case, all threats need not be considered for all groupings. The final evaluation "must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline."

C.4.c.6 What is expected of multi-state operator in regards to a risk ranking?

Multi-state operators need to be able to filter the relative risk ranking of their entire system by each individual state, or they may have a separate relative risk ranking for each state. They also need to provide the measures they are taking to reduce risk by state or be able to filter the measures they are taking system-wide to those they are taking in each state.

C.4.c.7 We plan to perform a risk ranking by state. Regardless of the outcome of the risk ranking, we will not decrease the historical level of expenditures in each state. However, a system wide risk ranking will be used to determine where expenditures beyond historical levels will be allocated. Does that meet the intent of the state by state risk ranking?

The operator sets the risk threshold, and determines where measures designed to reduce the risks of failure of its gas distribution pipeline are needed. The criteria should be the same for the entire system regardless of the state. Actions should be commensurate with risk. If the risk is viable, the operator must take some action to reduce it.

The intent of the state-by-state ranking is for State Pipeline Safety Programs to review the risks and measures to address them in the state for which they have jurisdictional authority. Since State regulators do not inspect systems in other states, they do not have firsthand knowledge of that portion of an operator's system. Some states may have additional regulatory requirements beyond DIMP.

C.4.g.7 We have a lot of steel risers which can be tightened to eliminate leaks. We have not reported these on Form 7100 in PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING YEAR in the past. Are these leaks considered reportable leaks per DIMP, and should this threat be considered in a DIMP plan?

The operator needs to follow their procedures and report all leaks which upon discovery are determined to be *hazardous* even if the leak is subsequently eliminated or repaired by lubrication, adjustment, or tightening.

The Annual Report instructions do not allow for excluding hazardous leaks even if they can be eliminated or repaired by lubrication, adjustment, or tightening. The Annual Report instructions state the following:

- a "leak" is defined as an unintentional escape of gas from the pipeline.
- A ***non-hazardous*** release that can be eliminated by lubrication, adjustment, or tightening, is not a leak [and thus not reported on the Annual Report]. (emphasis added)

49 CFR 192.1007(e)(1)(i) requires that operators report the number of *hazardous* leaks either eliminated or repaired as a DIMP performance measure (or the total number of leaks if all leaks are repaired when found). If an operator repairs all leaks when found rather than grading them, then all releases that can be eliminated by lubrication, adjustment, or tightening must be reported. In either case, this information is reported via Part C of the Annual Report.

The frequency of non-hazardous releases that are not reported could indicate a recurring problem (e.g., fittings issue, poor construction practices, human error) that should be considered in an operator's DIMP program.

C.6.1 What records does an operator need to maintain to demonstrate compliance with Subpart P?
Pursuant to § 192.1011, an operator must maintain records to demonstrate compliance with the requirements of subpart P for at least ten years. The records must include copies of superseded integrity management plans developed under subpart P. To the extent that records demonstrate compliance with the DIMP Rule requirements, they are to be maintained by the operator such that they are readily retrievable, protected from damage, and secured sufficiently to prevent unauthorized use. The records include but are not limited to:

- A written integrity management program
- Knowledge of the system documents
- Threat identification and risk assessment documentation
- Measures to address risk documentation
- Performance measures used to evaluate the effectiveness of risk mitigation measures documentation
- Correspondence with PHMSA or State/Local Regulatory Agencies related to DIMP implementation.

Operators are required to review and evaluate their DIMP programs periodically and at least every 5 years (§ 192.1007(f)). Operators must retain records related to these reviews for 10 years after they are conducted. If the review results in revision of the DIMP plan, then records associated with that revision must be retained for 10 years. If the review reaffirms the existing DIMP plan, without change, then the records associated with the original DIMP plan, particularly documents demonstrating knowledge of the system, must be retained for another ten years.

C.6.2 Must I retain all records I consider in developing my DIMP under §192.1011?

An operator must maintain records demonstrating compliance with the requirements of Subpart P for at least 10 years. This includes documents related to the development (or subsequent review) of your DIMP plan. An operator need not retain copies of all records reviewed/considered in developing its DIMP plan or its risk assessment for an additional 10 years. These records must be retained for their normal retention period specified in Part 192.

C.6.3 Am I required to submit my DIMP Plan to any Federal or State Regulator?

The pipeline safety regulations do not require an operator to submit its DIMP Plan to PHMSA. A copy of the DIMP Plan must be available for inspectors to review during a pipeline safety inspection.

Some states may have requirements regarding DIMP Plan submissions, or DIMP plans may be included in general requirements to submit all required plans. Operators should contact their state regulators for questions concerning state requirements.

PHMSA, or states not requiring filing, may still request a copy of the DIMP plan for purposes such as review prior to an inspection or as an aid in responding to inquiries.